

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS

FILED

MARSHALL REEDOM, JR
PLAINTIFF

JUL 26 2012

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

VS.

SHERIFF LOUIS M. ACKAL ET AL,
DEFENDANTS

CIVIL ACTION NUMBER: 12-3194

COMPLAINT BASED UPON POLICE HARASSMENT AND RACIAL
DISCRIMINATION ON BEHALF OF ROBERT REEDOM HIS BROTHER

- 1. THIS IS A CIVIL ACTION SEEKING DAMAGES AGAINST THE
DEFENDANT FOR COMMITTING POLICE HARASSMENT AND RACIAL
DISCRIMINATION The Violent Crime Control and Law Enforcement Act of
1994, 42 U.S.C. 14141 ("Section 14141 The Omnibus Crime Control and Safe
Streets Act of 1968, 42 U.S.C. 3789d(c)(3) ("Safe Streets Act"),
- 2. THE COURT HAS JURISDICTION SEVERE VIOLATIONS OF CIVIL
RIGHTS AND CIVIL LIBERTIES LAWS OF THE CONSTITUTION

3. THE PLAINTIFF, RESIDES AT:

MARSHALL REEDOM, JR
3904 CANDACE DRIVE
FORT WORTH, TEXAS 76119

4. DEFENDANTS IBERIA PARISH SHERIFF 'S DEPARTMENT IS A LAW ENFORCEMENT DEPARTMENT IN NEW IBERIA, LOUISIANA, AND THEIR ADDRESS IS:

SHERIFF LOUIS M. ACKAL IS IN CHARGE OF THE IBERIA PARISH

SHERIFF DEPARTMENT AND HIS ADDRESS IS 300 Iberia Street

Suite 120

New Iberia, Louisiana 70560

5. DEFENDANT OFFICER _____ IS AN OFFICER IN THE IBERIA PARISH SHERIFF'S DEPARTMENT AND HIS ADDRESS IS:

300 Iberia Street

Suite 120

New Iberia, Louisiana 70560

6. DEFENDANT, IBERIA PARISH SHERIFF'S DEPARTMENT IS A LAW ENFORCEMENT AGENCY-THEIR ADDRESS IS

300 Iberia Street

Suite 120
New Iberia, Louisiana 70560

6. DEFENDANT, DEFENDANT, LT. FARRELL BONIN, SHERIFF'S

DEPARTMENT IS A LAW ENFORCEMENT OFFICER AND SUPERVISOR

-HIS ADDRESS IS-

300 Iberia Street
Suite 120
New Iberia, Louisiana 70560

COUNT NUMBER 1

7. THE DEFENDANT IN AN ARBITRARY AND CAPRICIOUS WAY HAVE CONTRIBUTED TO THE POLICE HARASSMENT AND RACIAL DISCRIMINATION AND VIOLATIONS OF THE CIVIL RIGHTS AND

LIBERTIES OF THE PLAINTIFF. Section 14141 makes unlawful a pattern or practice of violating the United States Constitution or federal law. In doing so, it prohibits law enforcement agencies from regularly violating existing constitutional protections against police misconduct, such as excessive force, false arrests, unreasonable searches or seizures, and intentional racial or ethnic discrimination. It also prohibits agencies from regularly violating existing protections against police misconduct under federal statutes, such as Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d (discrimination on the basis of race, color or national origin by recipients of federal financial assistance), the Safe Streets Act (described above), and §504 of the Rehabilitation Act of 1973, 29 U.S.C. §794 (discrimination on the basis of disability) THERE EXIST AN ENORMOUS AMOUNT OF improper law enforced because a person's race is a factor.

COUNT NUMBER 2

9. THE DEFENDANT(S) ARE IN SERIOUS VIOLATIONS OF STATE AND FEDERAL LAWS REGARDING CIVIL RIGHTS AND DISCRIMINATION AGAINST PRIVATE CITIZENS.

COUNT NUMBER 3

10. THE DEFENDANT(S) DELIBERATELY GROSS NEGLIGENCE IN VIOLATING THE CIVIL RIGHTS AND LIBERTIES OF THE PLAINTIFF'S BROTHER, ROBERT REEDOM WHOS HAS SUFFERING SERIOUS INJURY AND BODILY HARM IN A CAR ACCIDENT WHICH HAS LEFT HIM DISABLED FOR LIFE.

COUNT NUMBER 4

11. THE DEFENDANT TOOK ADVANTAGE OF THE PLAINTIFF , BROTHER BECAUSE HE IS BLACK ; HIS CIVIL RIGHTS AND LIBERTIES WERE STILL VIOLATED DUE TO RACIAL AND DISCRIMINATION RIGHTS OF THE PLAINTIFF(S) BY NOT HAVING HIS ;LIFE CAREER ENDING ACCIDENT PROPERLY INVESTIGATED BECAUSE OF RACIAL OVERTONES

COUNT NUMBER 5

**12. THE DEFENDANT S) HAS SHOWN THAT IT HAS NO INTENTIONS
OF PROPERLY COMPLYING WITH FEDERAL LAWS CONCERNING
RACIAL DISCRIMINATION AND VIOLATIONS OF THE RIGHTS OF
PRIVATE CITIZENS.**

TRIAL BY JURY :

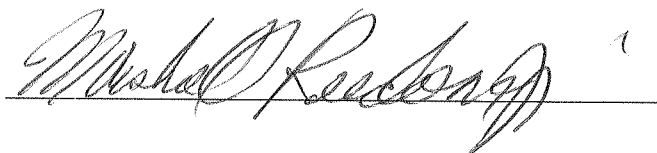
JURY TRIAL REQUEST.

RELIEF REQUESTED

PLAINTIFF SEEKS JUDGMENT AS FOLLOWS:

**A. DAMAGES IN THE AMOUNT OF 50,000,000 FOR THE MENTAL
STRESS AND PHYSICAL PAIN WHICH THIS SITUATION HAS CAUSED HIM.**

RESPECTFULLY SUBMITTED:

A handwritten signature in cursive script, appearing to read "Michael D. Rosenberg", is written over a horizontal line.

MARSHALL REEDOM , JR, PRO SE

***3904 CANDACE DRIVE
FORT WORTH, TEXAS 76119***



ED STATES POSTAL SERVICE

Rate
ed States Postal Service®
ERY CONFIRMATION™



ps.gov

*/Expéditeur:

Marshall Freedom, Jr.
3904 Candace Drive
Ft Worth, TX 76119

To:/Destinataire:

Clerk U.S. District Court
For The Central District
For Tarrant County
151 Pauline Finley Federal Bldg
and U.S. Courthouse
600 East Monroe Street

Country of Destination:/Pays de destination:

Springfield, Illinois

62701



PS00001000014



Please
Recycle



1006

62701

00066918-03